

**Victor Camargo-Juarez  
672 Brinkby Ave Apt 1607  
Reno, NV 89509  
Plaintiff in Pro Per**

\_\_\_Filed \_\_\_Received \_\_\_Entered \_\_\_Served On  
 Counsel/Parties of Record  
 NOV 15 2024  
 Clerk US District Court  
 District of Nevada  
 By: \_\_\_\_\_ Deputy

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

VICTOR CAMARGO JUAREZ

**Plaintiff,**

**VS.**

**WGS GROUP, INC.;**  
**DOES 1-10**

**Defendants.**

)  
)  
)  
)  
)  
)  
)  
**MOTION FOR ENTRY OF DEFAULT JUDGMENT**  
**AGAINST DEFENDANT WGS GROUP, INC.**  
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Plaintiff VICTOR CAMARGO JUAREZ requests that the clerk of court enter default against defendant WGS GROUP, INC.; pursuant to Federal Rule of Civil Procedure 55(a). In support of this request plaintiff relies upon the record in this case and the affidavit submitted herein.

Dated this 15<sup>TH</sup> day of November, 2024.

VICTOR CAMARGO JUAREZ, Plaintiff in Pro Per

DATED: 11-15-24

DEBRA K. KEMPI, CLERK



Victor Camargo-Juarez  
672 Brinkby Ave Apt 1607  
Reno, NV 89509  
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

VICTOR CAMARGO JUAREZ	)	CASE NO.: 3:21-cv-00064-ART-CSD
	)	
Plaintiff,	)	
	)	AFFIDAVIT IN SUPPORT OF MOTION FOR
	)	ENTRY OF DEFAULT JUDGMENT AGAINST
	)	DEFENDANT WGS GROUP, INC.
vs.	)	
	)	
	)	
WGS GROUP, INC.;	)	
DOES 1-10	)	
	)	
Defendants.	)	
	)	
	)	

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I, Plaintiff VICTOR CAMARGO JUAREZ, truthfully swears to, and states as follows:

1. I am the Plaintiff in Pro Per in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The summons and complaint were filed on August 9, 2021 and January 28, 2021.
3. Defendant was served with a copy of the summons and complaint on September 27, 2021, as reflected on the docket sheet by the proof of service filed on September 27, 2021.
4. Defendant failed to file an answer to the complaint in any manner whatsoever since the date said summons and complaint were filed on
5. Defendant has failed to appear, plead or otherwise defend within the time allowed and, therefore, is now in default.

6. Plaintiff requested, and obtained, a request for entry of default in this case on


7. Plaintiff was unaware until October 30, 2024, that the court had, in fact, granted the request for entry of default because Plaintiff had never received notice of that entry.

8. Plaintiff wishes to advise the Court that he does intend to continue prosecution of this case in good faith. Plaintiff has every intention of continuing this case by way of making a timely motion for entry of default judgment by November 15, 2024, which was the date given to Plaintiff by the Court in the document titled \_\_\_\_\_ Document 25 Order To Show Cause\_\_\_\_\_ and dated\_\_\_\_\_November 4, 2024\_\_\_\_\_.

9. Plaintiff requests that the clerk of court enter default against the defendant, WGS GROUP, INC.; in the amount of \$50,000 (Fifty Thousand Dollars).

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge. I attest that the contents of this Affidavit were made in truth and good faith.

Dated: November 15, 2024

  
\_\_\_\_\_

VICTOR CAMARGO JUAREZ, PLAINTIFF IN PRO PER

Victor Camargo-Juarez  
672 Brinkby Ave Apt 1607  
Reno, NV 89509  
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

VICTOR CAMARGO JUAREZ	)	CASE NO.: 3:21-cv-00064-ART-CSD
	)	
Plaintiff,	)	ENTRY OF DEFAULT JUDGMENT AGAINST
	)	DEFENDANT WGS GROUP, INC.
	)	
	)	
vs.	)	
	)	
	)	
WGS GROUP, INC.;	)	
DOES 1-10	)	
	)	
Defendants.	)	
	)	
	)	

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Plaintiff, VICTOR CAMARGO JUAREZ, requests that the clerk of court enter default against defendant WGS GROUP, INC.; pursuant to Federal Rule of Civil Procedure 55(a). It, appearing from the record that defendant has failed to appear, plead, or otherwise defend, the default of defendant (name) is hereby entered pursuant to Federal Rule of Civil Procedure 55(a).

Dated this 15<sup>th</sup> day of November, 2024.

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Debra K. Kempf, Clerk of Court

Victor Camargo-Juarez  
672 Brinkby Ave Apt 1607  
Reno, NV 89509  
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

VICTOR CAMARGO JUAREZ	)	CASE NO.: 3:21-cv-00064-ART-CSD
	)	
Plaintiff,	)	
	)	
vs.	)	CERTIFICATE OF SERVICE FOR MOTION FOR
	)	ENTRY OF DEFAULT JUDGMENT AGAINST
	)	DEFENDANT WGS GROUP, INC.,; AFFIDAVIT
	)	IN SUPPORT OF MOTION FOR ENTRY OF
WGS GROUP, INC.;	)	DEFAULT JUDGMENT & ENTRY OF DEFAULT
DOES 1-10	)	JUDGMENT AGAINST WGS GROUP, INC.
	)	
Defendants.	)	
	)	
	)	
	)	

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I, Virginia Juarez-Avina, hereby certify that I am over the age of 18, and am therefore of such age and discretion as to be competent to serve papers. I further certify that on this date I caused a copy of a Motion for Default Judgment, an Affidavit in Support of the Motion for Default Judgment, and a Proposed Default Judgment to be placed in a postage-paid envelope addressed to the defendant at the address stated below, which is the last known address of the defendant, and deposited the envelope in the United States mail.

USE THE DEFENDANT'S ADDRESS VICTOR-On the proof of service

WGS GROUP, INC.;

ADDRESS

Dated this 15<sup>th</sup> day of November, 2024.

V.J.A.  
Virginia Juarez-Avina

